

Mertz, Robert
Page 1 of 3

Environmental Impact Statement for Tucson Electric's proposed powerline

From: ramertz@access.mountain.net
[SMTP:ramertz@access.mountain.net]
To: Pell, Jerry
Cc:

Subject: Environmental Impact Statement for Tucson Electric's proposed powerline
Sent: 10/10/2003 8:07 PM
Importance: Normal

Dr. Jerry Pell
U.S. Department of Energy, Office of Fossil Energy (FE-27)
1000 Independence Avenue. SW
Washington, DC 20585

Dear Dr. Pell,

Our two sons are men now. Trevor the older son works at the small town hardware store in our town where he spends much of his time installing large appliances. In his spare time he uses his considerable mechanical skills to keep his 4-wheel drive truck and AT V working. Justin is going to college in a small but prestigious school near New York City. We could never afford to send him there, but he was given a great financial package at the school. He seems to be enjoying college life in a very positive way. Lacrosse, fencing, theater and studying keep him busy and socially involved with his fellow students. They are both over 6 ft 4 inches tall, athletic, and good-looking too.

Comment No. 1

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to wildlife.

Comment No. 2

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

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People say they get their looks and brains from their mother, and their off the wall sense of humor from me. Their peers respect them for their self-confidence and independent nature. They are sons to make any parents proud. Our sons are the most important and joyful part of my life. Although both my wife and I have spent the greater part of our adult lives interacting with young people as teachers, nothing comes close to the emotional intensity of raising your own children. They are mostly grown and independent of us now, but our commitment to them continues. Today the growth of the human population and the selfish consumerism that is spreading over the Earth is endangering the future of all humans. Will we be able to both save ourselves from self-destruction and maintain our freedom and individuality? I have been teaching students the value of developing a sustainable culture and personal life style for 25 years as a Biology and Environmental Earth Science teacher. I hope that the knowledge I have gained from my masters degree in Biology as well as my extensive reading have been delivered with the passion that I feel for the welfare of our planet. Teaching is a powerful way to have a positive influence on the future, but many issues are too important and too immediate to wait for the future. I am writing today about one of these issues.

1 | TEP's proposed "Western Route" and alternative "Crossover Route" would carve through some of the most remote and wild areas in Southeast Arizona, forever scarring the beautiful and irreplaceable landscape of the Tumacacori Highlands. This area contains several roadless areas as well as a citizen's proposed Wilderness area home to black bears, Mexican spotted owls, lesser-long nosed bats and peregrine falcons as well as lesser known species such as the Sonora chub, Mexican vine snake, elegant trogon and the Gentry indigo bush. A jaguar was sighted in this area only two years ago.

Comment No. 3

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)

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2 | The draft EIS is clearly inadequate, because it does not address important alternatives to TEP's powerline which would provide reliable service without destroying our environmental and cultural heritage, and which would not require huge increases to consumers' electricity bills.

3 | The recent blackout in the Northeast is an urgent reminder that our energy policy should be based on serving the public interest, not corporate private profits. I urge DOE to issue a new draft EIS which fully and rigorously explores all available options-including a local power plant and smaller power lines which would not serve Mexico-to meet the important public interest of providing reliable energy service to Santa Cruz County.

Sincerely,
ROBERT A. MERTZ
1205 Mulberry Ridge Road
SPENCER, West Virginia 25276

Miller, Christine
Page 1 of 1

PETITION		To John M. McGee, Forest Supervisor U.S. Forest Service
1	I oppose Tucson Electric Power's plan to run a mammoth 345,000 volt transmission line from Sahuarita to Nogales. The proposed route for this line would carve the heart out of the Coronado National Forest's Atacosa Highlands—a landscape of rolling oak-covered hills and grasslands containing three large roadless areas that provide habitat for reclusive or wide-ranging species like bears, cougars and jaguars. It would also bisect Sycamore Canyon, renowned worldwide as a refuge for rare species of plants and animals, including the highly endangered Sonoran chub, the elegant trogon and the Mexican vine snake.	
2	This irreplaceable and incredibly diverse area would be sacrificed by TEP's proposed power line, which would supply three times more power than Nogales needs. We can preserve our remaining wild lands while planning for our energy future, by investing in renewable energy like wind and solar and by encouraging local generation of electricity.	
3	I urge you to protect one of the most ecologically unique and biologically important areas of the Coronado National Forest by rejecting this destructive and unnecessary power line.	
Name and Address		Christine Miller 8540-14 New Salem street
San Diego, CA 92126		Signature Christine Miller

Comment No. 1

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to special status species in the Coronado National Forest.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Comment No. 2

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...."

Comment No. 3

Alternative and renewable power supply methods do not meet TEP's proposal and are thus not evaluated in this EIS (refer to Section 2.1.5).

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Millinovitch, Maggie
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October 8, 2003

Sue Kozacek, Acting Forest Supervisor
Coronado National Forest
300 W. Congress
Tucson, Arizona 85701

Re: Proposed Tucson Electric Power Sahuarita-Nogales transmission line

Dear Ms. Kozack,

1 | In writing to the Department of Energy my opposition to the proposed transmission line it was, "just the measurable facts, mam." I hope you will take a moment to read this short article I published in my monthly newspaper *The Connection*. It isn't just the facts; it's the heart of why I oppose the TEP project.

This is the place of my heart where I come to heal, to celebrate, to appreciate. Sycamore Canyon is more than the sum of its rocks, water, wildlife and flora. It fills the empty places in my soul: a by-product of "civilized" living. A day of listening to the cascading call of the Canyon Wren reverberating off the red rock canyon walls, lazing under a willow tree chomping on carrot sticks while considering a delicate wildflower is about all I need to get me back in tune with the rest of the planet, for a while.

I have come to this quiet garden in the desert for the past 30 years. Echoes of past visits and the promise of its enduring beauty greet me as I round each bend in the meandering stream. Reassuringly the canyon never changes yet is never the same. Also, no matter how often I return, I have a different perspective with which to appreciate it and new eyes to see what I missed before.

The lower canyon begins just off the serpentine, dirt, one lane Ruby Road and runs to the international boundary with Mexico. While all around may be dangerous territory, Sycamore is always a safe, protected place. No mule trains with illegal cargos venture this way. The tumble of rocks and water-filled pools carved of solid stone block their way to northern destinations. It is a designated wildlife and plant research area; there are no roads, no hunters, no motor homes, no ATVs, and no ghetto blasters. Alone, I feel safe - at home.

A short hike into the old parking area and I spot the huge oak tree where years ago, when my children were very young, we often pitched our huge old canvas tent. The homestead of Hank and Yank Bartlett sits nearby. With each visit a little less is left of the melting adobe walls from a time when the West was young and Apaches were fierce. The rains that wash the canyon clean also wash out a bit of history.

Today insects rule the canyon. Butterflies in a bright parade wobble on the light breeze. Bright orange dragonflies with transparent wings hover over the water showing their aerodynamic prowess despite being engaged in double-decked co-mingling. I watch for a convention of ladybugs; a few years back I came upon thousands of them meeting on the shady side of a large boulder. I scooped up a handful to join in their party and was welcomed by their using my body as a playground. In my hair, under my shirt and over my face they skittered until they bored of me and flew back to the convention.

Comment No. 1

The Federal agencies note the commentor's preference for the No Action Alternative.

Comment No. 2

Sections 3.1 and 4.1 present a description of the existing land use, and analyze the potential impacts to these resources from the proposed project, including potential impacts to Sycamore and Peck Canyons and the Atascosa Mountains.

Millinovitch, Maggie

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Coming to the first nature-provided swimming pool echoes a time when, as the kids grew older, we ventured further into the canyon. The pools are home to tiny fishes that nibbled on our skin if we stood too long in one place. Their hungry probing sent shivering sensations up our spines and we had contests to see who could stand still the longest without giggling.

Many side canyons flow into the main. Some are so narrow, steep and clogged with scrub they defy exploration. Others made of solid rock reward mountain goat climbing skills with waterfalls and clear pools for swimming. The refreshingly cool water can, even in the summer heat, feel chilly in the lower levels of these undisturbed, temperature-stratified pools.

Passing by one of the larger side canyons, I recall a hot summer day with my sons. We had been scrambling over the water-strewn boulders of this side canyon and I let the kids go on ahead. I sat quietly by a small pool in the shade of a twisted, stunted oak tree. In that shade grew velvet textured, bright green moss clinging to stones moistened by the seep water trickling over them. I could still hear the kids, but barely. Relaxing, contemplating nature's application of various shades of green, I caught movement out of the corner of my eye. I froze. A band of coati had come with their young for a sip of water. I must have blended into the surroundings like a homely girl at the prom, because they didn't notice me just a few feet away. I couldn't call to my children to share the experience nor could I reach for my camera; I didn't want to disturb the band. Instead, concentrating all my powers on observation and conservation of movement, I sat and rejoiced in the moment.

This time my visit is with a heavier heart. Sycamore Canyon, a large part of my life and my history, with my hopes for its future untroubled by the advances of "civilization," are now threatened.

2 Tucson Electric Power wants to put a monstrous, power transmitting abomination very close to this canyon. But Sycamore is not the only area in jeopardy. Peck Canyon, the Atascosa Mountains, along with miles and miles of wild areas are being considered for pathways to corporate riches. Please join me in putting a stop to this madness.

Thank you for your time and please disallow the transmission line on national forest land.

Sincerely,



Maggie Millinovitch
P.O. Box 393
Arivaca, AZ 85601
520-398-2379

Millinovitch, Maggie
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Maggie Milinovitch
P.O. Box 393
Arivaca, AZ 85601
520-398-2379

October 8, 2003

Dr. Jerry Pell, Manager
Office of Electric Power Regulation
Fossil Energy, FE-27
U.S. Department of Energy
Washington, DC 20585

Re: Proposed Tucson Electric Power Sahuarita-Nogales transmission line

Dear Dr. Pell,

There are a myriad of reasons to reject the entire proposed transmission line project. To come to any other conclusion than to deny the project would be indefensible. It serves no one but TEP stockholders and harms many. It harms the visual environment. It harms the biotic communities it passes through. Its ugly towers and lines will harm the recreational value of the land. It will be costly to the people it is purported to serve – but will not. *It is not needed.*

- 1 My main concern is the permanent damage it will do to an undisturbed area if the power corridor were allowed to follow either the western or the crossover routes. Those routes, much longer and more expensive to install and maintain, are being proposed as "preferred" to avoid the lawsuits for depreciated property values that would follow if the central, (through the resort community of Tubac), were followed. And those people would have every right to sue for damages. However, the wild areas have no such protection.

- 2 The terrain on the west side of the Tumacacori Mountains is extremely rugged. It can only be traversed on foot for much of its length and would take many days of hard scrabbling. For TEP to suggest that they will be environmentally sensitive during construction and maintenance is ludicrous. Even a stout burro would be challenged to make its way through. TEP will have to rip up the desert to accommodate their towers. The DEIS states, "total new temporary area of disturbance . . . in the Coronado National Forest . . . an estimated 197 acres." There is no such thing as temporary disturbance in the desert. This is not Minnesota. The desert does not heal. Mule tracks used by miners a hundred years ago are still visible.

- 3 If permission is granted to construct, in either of the two wilderness corridors, who is to monitor the construction? The people charged with making this very important decision have done little more than fly over or drive down Ruby Road and point into the distance. One wonders how much oversight there will be if this decision can be made without ever leaving the comfort of an air-conditioned vehicle. I live on the west side of the Tumacacori's. My home is about four miles and in clear view of the proposed wilderness routes. I have hiked these canyons and mountains: the Tumacacori's, the Atascosa's and Sycamore Canyon, for the past 30 years. I would be happy to escort any decision makers through these areas so that they may have a true understanding of the nature of the proposed project.

Comment No. 1

Potential economic benefit to TEP from the proposed project is outside the scope of the EIS.

Sections 3.1.2 and 4.1.2 present a description of the existing recreational opportunities and analyze the potential impacts to these resources from the proposed project.

Sections 3.2 and 4.2 present a description of the existing visual resources and analyze the potential impacts to these resources from the proposed project.

Sections 3.4 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources from the proposed project.

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...."

Comment No. 2

Section 4.3.2 states that the long-term reductions in biological activity (e.g., lack of vegetation in an area due to construction traffic) tend to be more pronounced in arid areas such as the proposed project area where biological communities recover very slowly from disturbances.

Millinovitch, Maggie
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4

I have very strong doubts as to the reasons posited for this entire project – reliable power to Santa Cruz County. I work in Tubac and have experienced one or two brief power “winks” in the past two years, except for one where a car knocked down a pole near the village. 345kV wouldn’t have helped. Cheap, unregulated, imported power from Mexico is a more likely impetus for this massive over-kill project. If additional power to Nogales were really the aim, why was a 115kV line not even considered in the DEIS.

Please listen to the many voices in opposition to the Tucson Electric Power Company Sahuarita-Nogales Transmission Line. The decision makers have an opportunity to make a positive difference in the lives of hundreds if not thousands of people who love these wild lands and want to protect them from thoughtless profiteers.

Very sincerely,



Maggie Millinovitch
P.O. Box 393
Arivaca, AZ 85601
520-398-2379

Comment No. 3

Any authorization issued to implement the proposed project on the Coronado National Forest would contain terms and conditions related to monitoring, as appropriate.

Comment No. 4

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP’s proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant’s proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant’s proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant’s business and to change the applicant’s proposal, but only to evaluate the environmental effects of the applicant’s business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant’s proposal.

A smaller transmission line (e.g., 115-kV line) in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP’s proposal, and therefore is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Montgomery, Dorothy
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Tucson Electric Power Sahuarita-Nogales Transmission
Line DEIS

From: DOROTHY MONTGOMERY
[SMTP:mont113@mindspring.com]
To: Pell, Jerry
Cc:

Subject: Tucson Electric Power Sahuarita-Nogales
Transmission Line DEIS
Sent: 10/8/2003 8:22 PM
Importance: Normal

1 I oppose the proposed Western and Crossover alternatives for the Sahuarita-Nogales Transmission Line for a number of reasons, both economic and environmental. The need for a project this size has not been demonstrated. The original reason for this project was to alleviate a demonstrated power reliability problem in Nogales, Arizona (ACC Order 62011). This problem could be solved with a smaller line within existing right-of-way or a small power plant in the vicinity of Nogales. These alternatives were not seriously considered in the DEIS.

2 It appears that Tucson Electric Power has upsized the project in hopes of a future connection with a possible power plant in Santa Ana, Mexico. (I have been told that buying and selling power between the United States and

3 Mexico would require an amendment to the Mexican Constitution.) Important economic changes have occurred which are not considered in the DEIS. Originally Citizens Utility supplied power in Nogales and agreed to buy a certain amount of power from Tucson Electric Power Company.

Comment No. 1

A new power plant in Nogales is not a viable alternative to a new, second transmission line. Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Comment No. 2

If TEP's proposed project is approved by each of the Federal agencies, then there would still be a variety of events that could preclude TEP from implementing this project, such as the possibility of failure by TEP to secure a power sales contract with CFE. Issuance of a Presidential Permit by DOE would only indicate that DOE has no objection to the project, but would not mandate that the project be built (refer also to the response the Center for Biological Diversity, Comment 2, regarding existing connections between the electric grids of the United States and Mexico).

The Federal agencies do not have any information suggesting that any power plant construction in Mexico is reliant upon or otherwise connected to TEP's proposed project. Therefore, the potential for construction of power plants in Mexico is not a connected action and is not analyzed in Chapter 4, Environmental Effects, of the EIS. Refer to the response to Sky Island Alliance, Comment 14, for further discussion of power plant construction in Mexico.

Chapter 5, Cumulative Effects, of the Final EIS has been augmented to discuss the growth of electricity demand in Mexico and the United States and the potential for new power plants, and to describe qualitatively the potential impacts in the United States (including air quality impacts) from power plant construction in southern Arizona and Sonora, Mexico. Chapter 5 has also been revised to describe the regulation of power plants in Mexico (including coordination between the United States and Mexico), potential fuel sources, and associated emissions.

Montgomery, Dorothy
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3
cont.

Tucson Electric Power Company has since bought out Citizen Utility's interests around Nogales. The citizens of Nogales are concerned about rate changes Tucson Electric Power has made and the potential for additional charges to pay for the proposed 345 kV line. There is a measure on the ballot on November 4 for the City of Nogales to take over local power service. One of the alternatives they are looking into is building a local power plant.

If that occurs, this will eliminate the need of the line to serve Arizona customers.

4

The DEIS has not thoroughly considered the value of the areas included in the Western and Crossover alternatives. Some of the area included in the Western and Crossover alternatives are currently roadless and have been considered for Wilderness status. Having hiked some of this area with knowledgeable botanists (including the late Jack Kaiser, the acknowledged expert on Santa Cruz County flora), I know this area to be particularly rich. Endangered animals such as the jaguar have been recorded in the area. This is in addition to the special visual qualities of the area.

While I am sure that Tucson Electric Power Company will attempt to close and revegetate the temporary access roads, that process will be particularly difficult, if not impossible, in this particular case. The rocky terrain and unreliable rainfall will work against this process. Keeping pedestrian and motor traffic off these tracks will be difficult because of the location near the Mexican border. They will attract both illegal migrants and drug smugglers and the law enforcement officers trying to catch them.

DOROTHY MONTGOMERY
mont113@mindspring.com
560 E. Monaco Place
Tucson, AZ 85737-7411

Comment No. 3

Because the Federal agencies cannot anticipate how the ACC may adjust consumer electricity rates in light of the proposed project, the potential change in consumer electricity rates is too speculative for inclusion in the EIS.

As discussed in section 2.1.5, a new local power plant does not eliminate the need for the proposed second transmission line.

Comment No. 4

Sections 3.3.3 and 4.3.3 discuss the affected environment and analyze potential impacts to endangered species, including potential impacts to jaguar.

Sections 3.2 and 4.2 of the EIS present analysis of the potential existing environment and potential visual impacts from the proposed project.

The Federal agencies have revised Sections 4.1.1, Land Use; Section 4.12, Transportation; and Chapter 5, Cumulative Impacts of the Final EIS based on the U.S. Border Patrol's response (USBP 2004) to the Federal agencies' request regarding illegal immigration and law enforcement activities in the proposed project vicinity. The U.S. Border Patrol's response generally re-enforced the information on which the relevant analysis in the Draft EIS was based. The U.S. Border Patrol stated that the roads associated with the construction and maintenance of the proposed project would contribute to an increase in illegal immigrant and narcotic smugglers in the area and affect U.S. Border Patrol operations. The effects of these activities are reflected in the Final EIS in the sections listed above. Refer also to the response to Sky Island Alliance, Comment 14.

Any authorization issued to implement the proposed project on the Coronado National Forest would contain terms and conditions to ensure road barrier effectiveness and maintenance, as appropriate.

Montgomery, Dorothy
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560 E. Monaco Place
Tucson, AZ 85737-7411
October 8, 2003

Sue Kozacek
Acting Forest Supervisor
Coronado National Forest
300 W. Congress
Tucson, AZ 85701

Subject: Tucson Electric Power Sahuarita-Nogales Transmission Line DEIS and
Needed Forest Plan Amendments

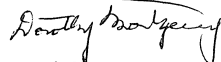
1 I **oppose** both the preferred Western alternative and the Crossover alternative on environmental grounds and because not all the reasonable alternatives were considered including ones that would not affect Coronado National Forest.

2 Areas included in the Western and Crossover alternatives proposed are currently roadless and have been considered for wilderness status. Having hiked some of this area with knowledgeable botanists (including the late Jack Kaiser, the acknowledged expert on Santa Cruz County flora), I know this area to be particularly rich. Endangered animals such as the jaguar have been recorded in the area. This is in addition to the special visual qualities of the area.

2 While I am sure that Tucson Electric Power Company will attempt to close and revegetate the temporary access roads, that process will be particularly difficult, if not impossible, in this particular case. The rocky terrain and unreliable rainfall will work against this process. Keeping pedestrian and motor traffic off these tracks will be difficult because of the location near the Mexican border. They will attract both illegal migrants and smugglers and the law enforcement officers trying to catch them.

3 The original reason that additional capacity between Sahuarita and Nogales was proposed was because of reliability problems at Nogales. A smaller line along existing right-of-way or an electric plant at Nogales would serve the need.

Sincerely,


Dorothy Montgomery

Comment No. 1

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Comment No. 2

Refer to the response to Comment 4 in the previous submittal from Dorothy Montgomery.

Comment No. 3

Refer to the response to Comment 1 in the previous submittal from Dorothy Montgomery.

Morello, Phyl
Page 1 of 2

From: fastphyl1@hotmail.com
Sent: Friday, October 10, 2003 7:00 AM
To: Pell, Jerry
Subject: Environmental Impact Statement for Tucson
Electric Power's proposed 345 kilovolt powerline

Dr. Jerry Pell
U.S. Department of Energy, Office of Fossil Energy (FE-27)
1000 Independence Avenue. SW
Washington, DC 20585

Dear Dr. Pell,

1 | Why is it there is always some one wanting to destroy our
American environment? Why is it our government actually
endorses these big businesses to do damage to our fragile
environment?

2 | I am writing to urge you to withdraw the current draft
Environmental Impact Statement for Tucson Electric
Power's proposed 345 kilovolt powerline.

3 | TEP's proposed "Western Route" and alternative "Crossover
Route" would carve through some of the most remote and
wild areas in Southeast Arizona, forever scarring the
beautiful and irreplaceable landscape of the Tumacacori
Highlands. This area contains several roadless areas as well
as a citizen's proposed Wilderness area home to black bears,
Mexican spotted owls, lesser-long nosed bats and peregrine
falcons as well as lesser known species such as the Sonora
chub, Mexican vine snake, elegant trogon and the Gentry
indigo bush. A jaguar was sighted in this area only two
years ago.

Comment No. 1

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system..." The Federal agencies have prepared this EIS to evaluate the potential environmental impacts of TEP's proposed project. Each Federal agency's purpose and need for action is explained in Section 1.2.2, Federal Agencies' Purpose and Need Statements.

Comment No. 2

The commentor's opinion that the Draft EIS should be withdrawn is noted.

Comment No. 3

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to wildlife.

Morello, Phyl
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4 The important goal of providing fully reliable electrical service to the city of Nogales and Santa Cruz County must be achieved. Unfortunately, instead of building the small transmission line necessary to achieve this goal, TEP has proposed a massive, environmentally destructive, and extremely controversial powerline designed to export power to Mexico.

5 The draft EIS is clearly inadequate, because it does not address important alternatives to TEP's powerline which would provide reliable service without destroying our environmental and cultural heritage, and which would not require huge increases to consumers' electricity bills.

6 The recent blackout in the Northeast is an urgent reminder that our energy policy should be based on serving the public interest, not corporate private profits. I urge DOE to issue a new draft EIS which fully and rigorously explores all available options-including a local power plant and smaller power lines which would not serve Mexico-to meet the important public interest of providing reliable energy service to Santa Cruz County.

Sincerely,

Phyl Morello
HC 2
Albrightsville, Pennsylvania 18210

Comment No. 4

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...." When a Federal agency is evaluating a request for a permit for a proposed action developed by a non-Federal applicant (e.g., TEP), CEQ has opined that Federal agencies should select alternatives which are feasible given the applicant's stated goals and reflect the "common sense realities" of the situation. Therefore, the Federal agencies are evaluating the proposed project presented by TEP to each of the Federal agencies (see Section 1.2.2, Federal Agencies' Purpose and Need Statements).

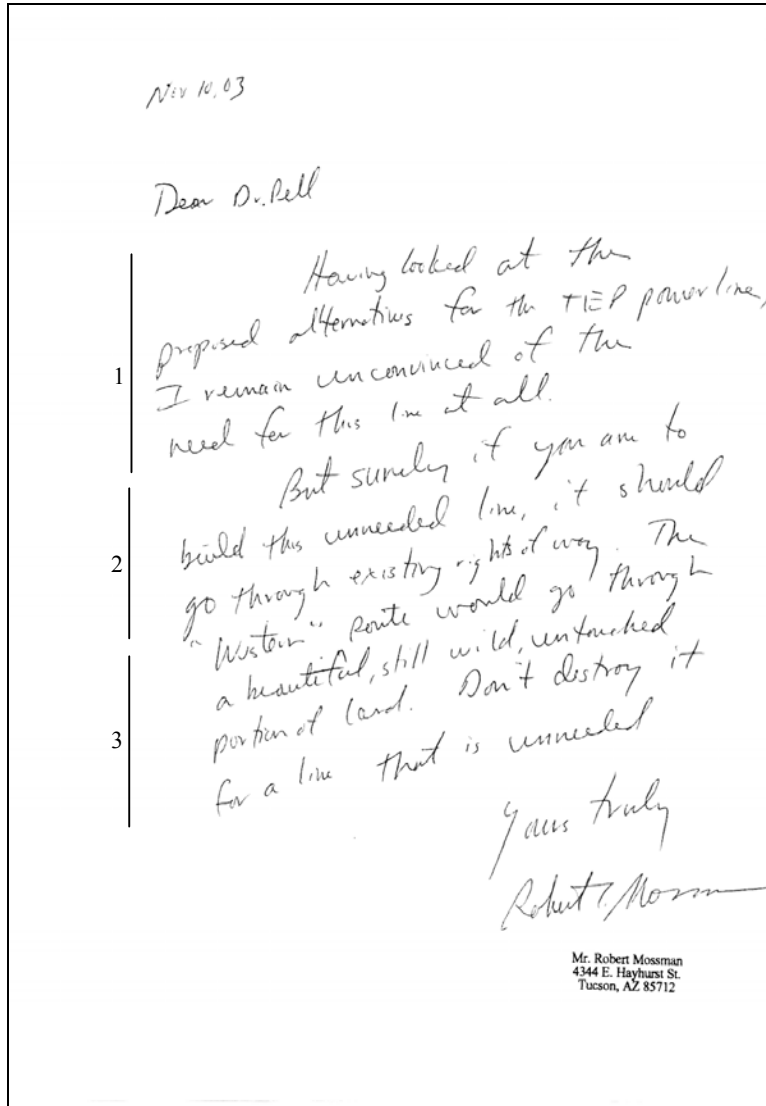
Comment No. 5

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Comment No. 6

A new power plant in Nogales is not a viable alternative to a new, second transmission line. Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)

Mossman, Robert
Page 1 of 1



Comment No. 1

The ACC is vested with the state's authority to decide how it believes energy should be furnished within Arizona's borders (for example, the need for and effectiveness of transmission lines within its borders). Refer to ACC, Comment 1, and to the revised text in Section 1.1.2, The Origin of TEP's Proposal: TEP's Business Plan and the Proceedings of the Arizona Corporation Committee, that provides explanation of the jurisdictions and authorities of the state and Federal agencies, and their relationship to this NEPA analysis.

Comment No. 2

A portion of each of the action alternatives follows or crosses an existing natural gas pipeline (see Table 2.3-1, Summary Comparison of Potential Environmental Effects of Alternatives) that is within a utility corridor and has some access roads and other associated ground disturbance. Building a line adjacent to the existing transmission line in the I-19 corridor was considered but eliminated from further analysis in the EIS (see Section 2.1.5 of the Final EIS).

Comment No. 3

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to wildlife habitat.

Mullarkey, Mike
Page 1 of 1

Mike Mullarkey
71 East 13th Street #10
Tucson, AZ 85701

September 23, 2003


Sue Kozacek
Acting Forest Supervisor
Coronado National Forest
300 West Congress
Tucson, AZ 85701

Dear Ms. Kozacek:

I am writing regarding the Tucson Electric Power Sahuarita-Nogales Transmission line DEIS and needed Forest Plan Amendments.

- 1 The proposed powerline is incompatible with the natural characteristics of the Tumacacori and Atascosa Mountains, which are an exceptional area for primitive recreation. I enjoy hiking in the area affected by the powerline, so my life and happiness would be negatively affected by the construction of the powerline in the Western or Crossover Routes.
- 2 I've read that TEP proposes to build over 20 new miles of road for the Preferred Route. This, even though the road density in the Tumacacori EMA is already above acceptable limits as set forth in the current Forest Plan. More road building, even with associated closures, would be in gross violation of the Forest Plan. And we know that those road closures are often unsuccessful.
- 3 A Forest Plan Amendment would only decrease the already dwindling supply of remote recreational experiences in the region. It would have an impact on many sensitive wildlife and plant species that are an important aspect of our Southern Arizona natural heritage. Those of us who were born here, and those of us who moved here to settle down into a more serene way of life, expect unspoiled wilderness, not unsightly and environmentally destructive powerlines that are designed to primarily serve another country.
- 4 I urge you to deny the special use permit for the Western and Central Routes because they are not compatible with the current uses of the affected area. Thank you for your time.

Sincerely,



Mike Mullarkey

Comment No. 1

Sections 3.2 and 4.2 present a description of the existing visual resources and analyze the potential impacts to these resources from the proposed project.

Sections 3.1.2 and 4.1.2 present a description of the existing recreational opportunities and analyze the potential impacts to these resources from the proposed project.

Comment No. 2

The Western Corridor would require construction of approximately 20 mi (32 km) of temporary new roads for construction on the Coronado National Forest, and the Central and Crossover Corridors would require fewer roads, and unnecessary project roads would be closed following construction (see Section 4.12, Transportation). The Tumacacori EMA of the Coronado National Forest in and of itself does not exceed road density limits set forth in the Forest Plan. Road density limits set forth in the Forest Plan are for the Coronado National Forest as a whole, not for individual land units or EMAs within the Coronado National Forest. TEP would close 1.0 mi (1.6 km) of existing classified road for every 1.0 mi (1.6 km) of proposed road to be used in the operation or long-term maintenance of the proposed project, such that road density on the Coronado National Forest would not be affected.

Comment No. 3

Sections 3.1.2 and 4.1.2 present a description of the existing recreational opportunities and analyze the potential impacts to these resources from the proposed project.

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources

An explanation of Forest Plan Amendments has been added (see Appendix H).

Comment No. 4

Sections 3.1 and 4.1 present a description of the existing land uses and analyze the potential impacts to these resources from the proposed project.

Notestine, Jim
Page 1 of 1

Oct. 14, 2003

Sue Kozacek
Acting Forest Supervisor
Coronado National Forest
300 West Congress
Tucson, AZ 85701

Re: Tumacacori Highlands

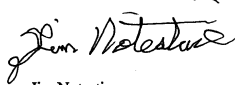
Dear Ms. Kozacek:

As a twenty-three year resident of Santa Cruz County Arizona, I would like to express how important the Tumacacori Highlands area is to me. The Tumacacori and Atascosa mountains as well as Sycamore Canyon/Pajarita Wilderness area have been a very important area for me to hike, bird and seek solitude in. In addition the area is an important wildlife migration corridor for rare species, both bird and mammal.

I urge you to support the Sky Island Alliance and Arizona Wilderness Coalition proposal for Wilderness designations in the Tumacacori Highlands. I also urge you to not support Tucson Electric Power's proposal to route a 345kV power line through the Coronado National Forest. It is unnecessary and the proposed 140 foot tall towers would be a severe impact to the aesthetics and natural resource values of this area.

In summary, I urge you to protect the natural values of the Tumacacori Highlands.

Sincerely,



Jim Notestine

POB 461
Sonoita, AZ 85637

irisjim@earthlink.net

Comment No. 1

Sections 3.1.2 and 4.1.2 discusses the existing recreational opportunities and analyze the potential impacts to these resources from the proposed project.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to threatened and endangered species.

Comment No. 2

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Comment No. 3

The Federal agencies note the commentor's preference for the No Action Alternative.